

**Duke, Daphne**

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**From:** Mike Weisskopf <[\[redacted\]](#)>  
**Sent:** Sunday, March 21, 2021 6:33 PM  
**To:** PSC\_Contact  
**Subject:** [External] Letter of Protest  
**Attachments:** Letter of Protest\_Weisskopf 21 Mar 21.pdf; 2020 Electrical Usage Data Weisskopf LoP attachment 21 Mar 21.xlsx

Letter of Protest provided by: Mike Weisskopf

An excel file attached to this e-mail is an attachment to the Letter of Protest

The information in this Letter of Protest will be used for my testimony scheduled for 9:23AM on Tuesday 23 March.

I will mention to the commission that all the information in my testimony is available in a Letter of Protest. Please make this Letter of Protest and excel file available for members of the commission.

Mike W.



\* Required Fields

**Letter of Protest**  
**Docket No. 2020-229-E**

Date: \* 3/20/2021

**Protestant Information:**

Name \* Mike Weisskopf

Mailing Address \_\_\_\_\_

City, State Zip \* Charleston, SC 29407

E-mail \_\_\_\_\_@com

**1. What is your connection or interest in this case? \* For example, are you a customer of the Company that is the subject of this pending proceeding? (This section must be completed. Attach additional information if necessary.)**

I am a current Dominion solar customer.

**2. Please give a concise statement of your protest. \* (This section must be completed. Attach additional information if necessary.)**

I installed a residential solar system on my house in late 2018. As an engineer, I was interested in learning about solar systems and under the existing utility rate structure and federal/state incentive structure, the investment in a solar system made financial sense. Tax credits covered over 50% of initial costs and, with net metering in place, it seemed possible to recover costs in five to six years. In preparation for this testimony, I examined my net metering costs, Dominion's Solar Choice rate increase, and Act 62. I have come to realize what a good deal the current net metering is for solar customers based on the findings of my analysis. I can intuitively see that I benefit from Dominion's utility and energy infrastructure rate base as a net metering customer, and that my benefit to a certain degree at the expense of non-solar customers. I get it. The question is how much does my solar system really cost Dominion and what is a fair rate structure for all customers.

(see attached for further explanation)

**3. Do you wish to make an appearance at a hearing in this proceeding, if scheduled, and offer sworn testimony? \***

Yes

Signature Required: M.K. Weisskopf

## Section 2 Continued:

**Point #1** - Dominion's proposed Solar Rates can be over a 4000% increase over current rates.

**Explanation:** Understanding Dominion's Solar rates can be rather abstract with Facility Fees, Subscription fees, and time of use ("TOU") rates for import of electrical power and purchasing of exported solar power. To provide an understandable example of the real costs of Solar Choice, I was able to download my daily 2020 electrical usage in 15-minute periods from my SolarEdge portal. Using Dominion's proposed Solar Choice rates and using my 2020 data, I was able to calculate my total annual 2020 costs would have been \$1,041. In 2020, I netted an excess of almost 3000 kWh of electricity, which Dominion reimbursed at 3c a kWh. With this reimbursement, my actual 2020 Dominion solar net metering electrical cost was \$25, so I would go from paying \$25 annually under the current rate structure to \$1,041 annually – a 4000+% increase.

**Point #2** – Subscription Fees make no sense, are a way to charge for behind the meter self consumption and therefore must be removed from the rate structure.

**Explanation** – The Subscription Fees proposed by Dominion are large fixed monthly costs that have no direct relation to how much you use the grid infrastructure. Using the wattage of the panels on your roof to charge high fees severely impacts homeowners that have houses that do not have good southerly exposure and tree shade issues – they are paying a fixed fee for an energy system size that does not have the equivalent power production. To make up for these issues the homeowner might have additional panels. The result is you can have two different homeowners with the same wattage of panels on the roof that produce widely different amounts of power generation. Their use of the grid will be very different and therefore charging them the same Subscription Fees is not fair. In addition, if you go on a trip for a month or your solar system is down for maintenance or roof repair, you still pay subscription fees even though you are not fully using the grid for solar power.

To provide a specific example of these costs, the system I have installed on my house is rated by Dominion as 8.1 kW CEC-AC, with Subscription Fees at \$5.40 per kW, the total fee is \$43.77. Add the \$19.50 Basic Facilities Charge plus \$1 Fuel Fee and fees cost over \$65 before any electrical power is exchanged. Before I installed solar, I had some months where the entire electrical bill was less than \$65. This is a blatant example of how high Solar Choice fees are. How can Solar Choice fees be higher than previous full residential monthly electrical costs? How unfair is this?

Dominion came up with Subscription Fees as a backdoor way to make up for lost revenue for behind the meter self-consumption. This is in direct violation to Act 62 therefore the commission should not approve Subscription Fees. To cover whatever reason Dominion thinks it needs Subscription Fees should be replaced by higher rates for imported kWh. This will make the new costs Dominion needs to charge solar customers fair because they will be based on actual grid usage. Subscription Fees are just made-up charges that have no basis. Getting rid of Subscription Fees will also disincentivize folks from gaming the system by installing small systems with a few panels just to get lower rates (as explained in Mr. Thomas Beach's testimony)

**Point #3** - With Solar Choice rates, clearly residential solar investment in South Carolina will no longer make sense which means the residential solar industry will have severely limited future growth, if not fully exit the state.

**Explanation** – As explained in Point #1, my costs under proposed Solar Choice using actual 2020 usage data would have been \$1,041. If I would have used the regular Dominion Rate 8 Residential Service, my costs would have been \$1,408. This is a difference of \$366 for the year. In a typical case a homeowner might pay \$20,000 to install a solar system and then receive about \$10,000 in tax credits for a total outlay of \$10,000. If you save approximately \$366 a year with solar, it will take over 25 years to cover your original investment. What rational homeowner would make that sort of investment? Residential solar will no longer make sense. With current net metering rates, I estimate I will recover original investment costs in 8 years. New solar customers should have the same opportunity. Act 62 states we should still encourage residential solar. We need to find a solution where it makes sense for homeowners to still invest in solar and maintain the jobs and other economic benefits that come with residential solar deployment.

It is interesting to note that Keller Kissam the Dominion president of electric operations does not agree with this assessment. He provided an opinion piece for the Charleston Business Journal on 22 February the day before the SC Public Service Commission hearing on 23 February that was titled “5 Facts you need to know about solar in SC”. His Fact #3 was “The proposed Solar Choice tariff will not discourage South Carolinians from choosing solar.” Based on the analysis outlined above, using actual data and the proposed rate structure, this is absolutely not true. The only piece of evidence he provided to support his “fact” was solar customers will “get rates below 7¢ a kWh “most of the time.” Couple the TOU rates with Monthly Subscription Fees and increased Basic Facilities Charges (at a premium to rates paid by regular residential customers), Solar Choice rates will absolutely discourage South Carolinians from choosing solar. The best that can be said is Mr. Keller Kissam is disingenuous and misleading with his “facts.”

**Point #4** - Dominion’s purchase rate for exported residential solar is exploitive and if they are going to charge TOU rates, Dominion needs to pay a fair price exported solar power.

**Explanation** – Dominion proposes to purchase exported solar power at 3.6¢ per kWh. This is what they pay to purchase large quantities of electrical power from third party generators. This power is provided at extremely high voltages to allow for long distance transmission. Dominion has to maintain an expensive infrastructure to transport this power and then use a number of step-down transformers on the way to residential neighborhoods. The beauty of distributed residential solar is it is produced where it is needed, near adjacent loads, i.e., nearby homes. The transmission of excess power produced on residential solar systems to nearby homes does not utilize large scale transmission or high voltage transformer infrastructure. Exported residential solar power goes up to the transformer on the utility pole and then looks for that open electrical spigot (appliances) at the closest consuming neighbors. Dominion charges these neighbor customers 12¢ kWh retail residential rates for this local exported solar power. So what is happening here is Dominion is paying the solar customer 3.6¢ kWh and then seconds later selling it across the street for 12¢ kWh. What a deal for Dominion. Dominion gets low-cost wholesale power, does not have to pay the long distance transport cost and sells it at retail rates. Local exported residential solar power is worth more than 3.6¢ per kWh and Dominion should pay a fair price for it. A fair price would be the 6.7¢ a kWh Dominion proposes to sell power to solar customers (during off peak periods)

**Conclusion:** Dominion’s Solar Choice rates are unduly high and will severely hinder future residential solar deployment to the point the real name should be “Solar No Longer a Choice”. Using my case as an

example, I produce all the electricity I need and give Dominion almost 3,000 extra kWh, yet I need to pay over \$1,000 dollars a year to get energy I produced back at the time when needed. Dominion (Mr. Keller Kissam) makes the point that the 11,000 solar customers use the “power lines, generation stations, and all other associated costs” paid for by the 740,000 non-solar customers – so 1% of customers are putting this financial burden on the 740,000 customers. How can a small 1% really affect the 99%? Dominion’s Solar Choice rates will without doubt, ensure there will be no additional South Carolina residential solar and the jobs and economic benefits that go with it will leave too. Anyone who can do simple math can figure out that an investment in a solar system does not make sense under the Solar Choice rates – there is, essentially, no choice to be made. The 1% of solar customers will just get smaller as the Dominion customer base grows.

Dominion is dead set on a huge solar cost increase to recover a cost burden caused by 1% of its customers. Okay, so what is fair solution? I propose Dominion should treat solar customers just like regular non solar residential customers. Charge solar customers exactly what they charge for Rate 8 Residential Service (or even the Rate 5 Residential TOU Service). Charge the same rates for consumed power and same Facilities Charge. The only difference is pay solar customers a truly fair cost for exported energy. How can this not be fair to everyone? Doing this will certainly cover the costs for “power lines, generation stations and all other associated costs” because the same residential rates for consumed energy will be used by everyone, and it will do so without destroying the residential solar industry in South Carolina,

Note: Accompanying this Letter of Protest is an Excel file that provides all the financial and usage data used in this letter.